

IN THE DISTRICT COURT OF THE UNITED STATES
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

JOHN JENKINS,

Plaintiff,

vs.

STEVEN BRADY and
T&C TRANSPORTATION, LLC,

Defendants.

Case No.: 2:24-cv-07183-BHH

**PLAINTIFF'S RULE 26(A)(2) EXPERT
WITNESS DISCLOSURES**

Plaintiff John Jenkins hereby submits his expert disclosure as required by Federal Rule of Civil Procedure 26(a)(2) and the Court's Case Management and Scheduling Order. Plaintiff has not retained any expert witnesses pursuant to Rule 26(a)(2)(B) at this time.

Plaintiff reserves the right to call his treatment providers as witnesses. Plaintiff anticipates that his treatment providers will qualify as experts by knowledge, skill, experience, training, or education, and Plaintiff reserves the right to elicit testimony regarding each provider's opinions, if any, regarding the cause, diagnosis, treatment, and prognosis of Plaintiff's injuries. Plaintiff's treating providers who may be called testify at trial and are known at this time are as follows:

1. Zain Qazi, MD

Dr. Qazi is a board-certified radiologist who has read the magnetic resonance imaging of Plaintiff's cervical and lumbar spine. Dr. Qazi is expected to testify regarding his opinions of the imaging consistent with Dr. Qazi's medical records.

2. Jason Highsmith, MD

Dr. Highsmith is a board-certified neurosurgeon who has provided treatment for Plaintiff's spinal injuries following this crash. Dr. Highsmith is expected to testify regarding his treatment of Plaintiff's spinal injuries, his opinions regarding the causation of Plaintiff's spinal injuries, and his recommendations for future care, consistent with Dr. Highsmith's medical records.

3. John Nicholson, MD

Dr. Nicholson is a pain medicine physician who has provided treatment for Plaintiff's spinal injuries following this crash. Dr. Nicholson is expected to testify regarding his treatment of Plaintiff's spinal injuries, his opinions regarding the causation of Plaintiff's spinal injuries, and his recommendations for future care, consistent with Dr. Nicholson's medical records.

Because Plaintiff's medical care is ongoing, Plaintiff reserves the right to supplement his list of treatment providers and to call any treatment provider as a witness at the trial of this case. Plaintiff also reserves the right to supplement this disclosure later should the case develop in such a way to warrant additional expert testimony on Plaintiff's behalf. Plaintiff further reserves the right to elicit expert testimony from individuals named as experts by other parties, as well as other witnesses later identified who may qualify as experts under the Rules of Evidence.

MORGAN & MORGAN, P.A.

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